

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

QUINCY MUTUAL FIRE INSURANCE COMPANY,)	Civil Action No. 04-11819 MLW
)	
)	
Plaintiff,)	
)	
v.)	
)	
UNITED STATES OF AMERICA,)	
)	
Defendant.)	

JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1

Pursuant to Local Rule 16.1(D), the parties to this action, plaintiff Quincy Mutual Fire Insurance Company, by and through their undersigned counsel, and the defendant United States of America, by and through their undersigned counsel of record, hereby submit this Joint Statement.

1. Proposed Plan for Discovery:

The parties propose that discovery proceed as follows:

- a. Automatic disclosure to be served by February 9, 2005
- b. All fact discovery requests to be served by February 23, 2005
- c. All fact depositions to be noticed by March 30, 2005
- d. Fact depositions to be completed by May 31, 2005
- e. Rule 26(A)(2)(B) disclosure of trial experts by plaintiff served by June 8, 2005
- f. Rule 26(A)(2)(B) disclosure of trial experts by defendant served by June 22, 2005
- g. Expert Depositions concluded by July 29, 2005

2. Schedule For Filing of Motions

Any dispositive motions to be filed by August 15, 2005. Oppositions to be filed within 14 days thereafter.

3. Certification

The parties respectfully request that they be granted leave to file the necessary Rule 16.1(D)(4) certifications on or before January 26, 2005.

4. Magistrate Judge

The parties consent to have this matter referred to a Magistrate Judge for all purposes.

Respectfully submitted:

By the parties,

The Plaintiff,

The Defendant,

Quincy Mutual Fire Insurance Company
By Its Attorney

MICHAEL J. SULLIVAN
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/s/ Paul Valentino
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Dated: January 20, 2005